

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
Eastern DIVISION

FILED

MAY 27 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

Eric Saxton
NAME OF THE PLAINTIFF

- vs -

MAC

Case No.

JURY TRIAL DEMANDED

YES ☒ NO ☐

NAME OF THE DEFENDANT OR
DEFENDANTS (Enter above the full name(s) of
ALL defendant(s) in this lawsuit. Please
attach additional sheets if necessary.)

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This employment discrimination lawsuit is based on (check only those that apply):

☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.
NOTE: *In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).
NOTE: *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

☐ American with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.
NOTE: *In order to bring suit in federal district court under the American with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

____ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, et seq., for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

NOTE: *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

____ Other (Describe)

PARTIES

2. Plaintiff's name: Eric Saxton

Plaintiff's address: 2205 McKelvey RD

Street address or P.O. Box

Maryland Heights MO. 63043

City/ County/ State/Zip Code

314-520-9931

Area code and telephone number

3. Defendant's name: MAC / west

Defendant's address: 1777 Des Peres RD

Street address or P.O. Box

Town + Country MD. 63131

City/County/State/ Zip Code

314-539-4444

Area code and telephone number

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

July 2012 - Sept 2014

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: 1/20/2015
☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: 1/6/2015
☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes ☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☐ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

☐ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☐ failure to hire me

☐ termination of my employment

☒ failure to promote me

☐ failure to accommodate my disability

☒ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☒ harassment

☒ other conduct (specify): degraded, lied to, dishonest

insulted intelligence on a frequent bases

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

- ☒ race
☐ religion
☐ national origin
☐ color
☐ gender
☐ disability
☐ age (my birth date is: _____)
☐ other: _____

Did you state the same reason(s) in your charge of discrimination?

☒ Yes ☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

A. Promoted Someone (Larry Jackson) with Zero Sports Programming background
falsly accused me of not wanting That position
B. Paid white employees a Significant amount more than me for
doing the Same Job. MY Experience was 20 Plus Years and 9 of
those were at the MAC. Compared to 1 Year with the mac for
white employee. Rumor white employee had Zero experience prior to
MAC.

- C. Used their Power (management) Wally Smith GM + Jeff Turo AD. to racially harass me, insult me, and diminish my accomplishments, which were not the case with other ^{Letters of accomplishment}
- C.(2) Letter of Praise from Parent Replied with Negative Insult
- C.(2) Justified Supervisor Unprofessional behavior when he yelled + screamed at me for coming in on my day off. ^(Larry Jackson) BY Suspending me when I complained about his behavior. Every year prior I came in on day off to plan for camps
- C.(3) Questionable investigation when white employees replaced my picture on the board with a cat implying I was a (Pussy cat) for telling on them for not doing their job correctly
- C.(4) Questionable investigation when white employee (Dave Schwent) went off on me in front of kids + staff for asking why he allowed kids to have candy and not the other campers. He also threaten me saying he would "kick my ASS" nothing disciplinary happened to him.
- C.(5) Jokingly threw Licorice (west club mg) Darrin Harreix
- C.(6) A Noose was hung in employee breakroom and 3 African Americans (Robert ^{Belt}?, Dave Collier, and myself) all had a lengthy discussion about it. I actually took pictures which were lost when I got a new phone, but we all were afraid to bring it to the Management that has let us all down prior on previous incidents.

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

_____ are still being committed by the defendant.

_____ are no longer being committed by the defendant.

☒ may still be being committed by the defendant.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments;
cite no cases or statutes.


A. Penalize the Mac for this behavior, Force written or Public apology

B. Compensate me for 2012-2014 for MY ^{Maximum} Potential Income

C. Compensate me for 2015-2020 or beyond for giving me

No choice to constructively discharged myself from abuse, harassment, intimidation

Signed this 27 day of May, 2015.



Signature of Plaintiff